



**PUEBLO OF ISLETA**  
**P. O. BOX 1270, ISLETA, NM 87022**

June 25, 2018

SUBMITTED VIA EMAIL

Ms. Evelyn Rosborough  
[rosborough.evelyn@epa.gov](mailto:rosborough.evelyn@epa.gov)  
U.S. Environmental Protection Agency  
NPDES Management Section (6WQ-PO)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

RE: NPDES Permit Number: NM0022250 Albuquerque Bernalillo County Water Utility Authority /  
Southside Wastewater Reclamation Plant

Dear Ms. Rosborough,

The Pueblo of Isleta is approximately five miles downstream from the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) Southside Water Reclamation Plant (SWRP) discharge point into the Rio Grande. The Pueblo has adopted and approved Water Quality Standards (WQS) in the same manner as a state as contained in 40 CFR 131.8. The general and specific stream standards for the Pueblo of Isleta (PI) are provided in Surface Water Quality Standards (PIWQS) approved by EPA on July 22, 2005. The designated uses of the Rio Grande, according to PIWQS, are primary contact ceremonial use, primary contact recreational use, agricultural water supply use, industrial water supply use, warm water fishery use, and wildlife usage.

The Pueblo of Isleta remains concerned about the long history of non-compliance at the SWRP. Based on plant tours and meetings the Pueblo attended, we recognize that management at the ABCWUA have taken major steps to address the many facility, process, planning, and budget issues that have crippled the efficiency and safety of the SWRP for many years. Substantive work has been undertaken to replace and repair major facilities at the SWRP in accordance with Compliance Orders. Nonetheless, the Pueblo remains concerned that potential problems with O&M budgets could lead to another decline into poor operations and re-escalating permit violations.

In Part 1 Section E of the draft permit – POLLUTION PREVENTION REQUIREMENTS – EPA mandated that,

“[t]he permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility.”

It appears EPA is asking for an Asset Management Plan for the SWRP. The permit language suggests wording which gives ABCWUA an option to create a new plan that may not tie ABCWUA to specific

capital improvement timelines, goals, and/or objectives. There is already an existing “Southside Water Reclamation Plant Renewal and Asset Management Plan (RAMP) dated December 2015.” Similar to requirements included in Administrative Compliance Orders issued to ABCWUA, the RAMP appears to require capital expenditures for facility upgrades, yet this document is not specifically referenced to be updated in the proposed permit. This section of the permit is allusive and doesn’t substantiate how or where ABCWUA will address the “useful life of the facility”. The Pueblo is requesting clarification on how EPA and ABCWUA will work together to prioritize future infrastructure improvements over the next 15 – 20 years.

## **PIWQS**

There are significant monitoring requirement changes proposed in the permit that both eliminate and add pollutant minimum and maximum discharge limitations. The Pueblo recognizes the impact and importance our WQS has on the ABCWUA proposed permit. The Pueblo is committed to issuing a Request for Proposal (RFP) for professional engineering consulting services in FY 2018 – 2019 to assist in updating the Pueblo’s WQS based on quantifiable and science-based research that will focus both on water quality and values important to the Pueblo. In accordance with 40 CFR Part 122.44 (d), the Pueblo may request to reopen and modify the ABCWUA NPDES permit. The Pueblo will seek to collaborate with both EPA and ABCWUA to coordinate proposed changes to the Pueblo’s WQS.

## **Reporting:**

After reading Part I Sections C & D, and Part II Section B, there appears to be contradicting requirements for ABCWUA’s reporting measures. Example: one section requires reporting within 12 hours and another section within 24 hours. In the spirit of environmental stewardship, the Pueblo would like to eliminate the amount of paper reports our office is currently receiving for both the Effluent Overflows and Sanitary Sewer Overflows (SSOs) by receiving reports electronically. The Pueblo is not familiar with NetDMR; however, in this digital age we are requesting EPA and ABCWUA to consider allowing the Pueblo access to ABCWUA’s electronic submittals through <https://netdmr.epa.gov>.

For major overflows that reach the river, the Pueblo is amenable to condensing the contacts in the “Overflow Emergency Response Plan” and establishing a single, dedicated email that receives emergency notifications. Given the identified “Primary Ceremonial Contact Use” in the PIWQS, the Pueblo would like to retain the requirement that ABCWUA calls the appropriate emergency contact number(s) until a person is notified. The Pueblo is requesting to meet with both EPA and ABCWUA to discuss streamlining the reporting requirements and to reduce the amount of paperwork ABCWUA issues.

## **Summary**

In summary, the Pueblo requests that EPA requires the ABCWUA to provide the Pueblo with copies of relevant documents, including all monitoring and compliance reports, information on SWRP facility specific to maintenance, repair(s) and replacement(s), expenditures for capital and O&M, projections for next-year’s compliance, facility upgrades, and finances contained in ABCWUA’s annual budget as approved by the ABCWUA Board.

Thank you for giving us the opportunity to submit the Pueblo's comments. If EPA and ABCWUA would like to meet and discuss any of the issues contained in this letter and/or any other comments submitted to EPA specific to this proposed permit, please contact the Pueblo's Public Services Director, Ms. Shawna Ballay, at 505.869.4965 or [poi17501@isletapueblo.com](mailto:poi17501@isletapueblo.com).

Respectfully,  
PUEBLO OF ISLETA



J. Robert Benavides  
Governor

Cc: 1<sup>st</sup> Lt. Governor Max Zuni, Pueblo of Isleta (Email Only)  
2<sup>nd</sup> Lt. Governor Andrew Teller, Pueblo of Isleta (Email Only)  
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